

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK
RATIONALIZATION SERVICE CHANGES, 2012

Docket No. N2012-1

INTERROGATORIES OF THE AMERICAN POSTAL WORKERS UNION, AFL-CIO
TO UNITED STATES POSTAL SERVICE
(APWU/USPS-18-20)
(March 27, 2012)

Pursuant to Rules 25 through 28 of the Rules of Practice, American Postal Workers Union, AFL-CIO ("APWU") directs the following interrogatories, which seeks information relevant to the rebuttal testimony of the APWU, to the United States Postal Service.

Instructions and Definitions applicable to these Interrogatories are contained in the Interrogatories of the American Postal Workers Union, AFL-CIO to the United States Postal Service witness David E. Williams (APWU/USPS-T1-1-4), filed on December 22, 2011, and are hereby incorporated by reference.

Respectfully submitted,

Darryl J. Anderson
Jennifer L. Wood
Counsel for American Postal Workers Union, AFL-CIO

APWU/USPS-18 Please refer to Mr. Williams' response to APWU/USPS-T1-33(b). In his response, Mr. Williams presents a table representing current and potential distributions by delivery day (transit days) for the package services category. BPM flats, BPM parcels, Media Mail/Library, and Parcel Post are presented. For each sub-category depicted, the data indicates an increase in volume delivered on day two once the proposed network changes are implemented.

- a) Please describe how the proposed network changes could result in the potential for an overall increase in the proportion of volume delivered in two days.
- b) What is the source of both the current and potential figures in the chart?
- c) What are the assumptions, if any, and the associated methodology used to project the potential distribution?

APWU/USPS-19. Please refer to Mr. Williams' response to APWU/USPS-T1-34. Mr. Williams indicates in this response that "network changes may result in changes in the expected delivery day within each range for specific origin-destination Zip Code pairs." He further indicates that "the Postal Service is currently evaluating new service areas and assessing any potential changes required for Express Mail and Priority Mail service standards."

- a) When will the referenced evaluation be complete?
- b) Once such evaluation is complete, please respond to the original interrogatory APWU/USPS-T1-33 based upon the operating plans developed to support the planned network changes instead of service standards or forecasts.

APWU/USPS -20 The following list of facilities is contained in USPS-LR-N2012-1/17 and USPS-LR-N2012-1/34 sponsored by witness Rosenberg (USPS-T-3) and contains the notation that the facilities were open at the time of Ms. Rosenberg's analysis. Many of these facilities do not appear in USPS-LR-N2012-1/57 which purports to identify all the mail processing facilities in the network on September 15, 2011. Only a few of these facilities are on the February 22, 2012 list of facilities approved for consolidation.

- a) Please indicate which of these facilities were open and processing mail on September 15, 2011.
- b) Please indicate which of these facilities currently remain open and is processing mail.
- c) Please list the types of mail processing equipment used in these facilities, e.g., CSBCS, DBCS.
- d) Please indicate which of these facilities are considered mail processing facilities or locations. If not mail processing facilities, what type of facilities are they?
- e) Please indicate which of these facilities are being studied or have been approved for consolidation as a result of the current Network Rationalization Plan. If there

- is a separate initiative underway to rationalize these facilities please identify the initiative and the time frame of that initiative.
- f) For any of these facilities identified for consolidation will an AMP study be conducted? If an AMP study will not be conducted for any of these facilities identified for consolidation, please explain why a study will not be performed.
 - g) If subject to consolidation without an AMP requirement, how does the Postal Service document the business case for the consolidation? What is the approval process for the consolidation of facilities in the absence of an AMP study?
 - h) For any of these facilities being studied or slated for closing and/or consolidation has or will the Postal Service give public notice and take community and mailer input before making final decisions? If so, please describe the public notice and input process or these facilities. If public notice and the opportunity to provide input on the consolidation and/or closure have not and will not be provided please explain why this is not being done for these facilities.

GREAT LAKES	GATEWAY	Alton IL	160162	Y
NORTHEAST	ALBANY	Amsterdam NY	350195	Y
SOUTHWEST	ALABAMA	Auburn AL	010460	Y
CAPITAL METRO	ATLANTA	Austell GA	120484	Y
GREAT LAKES	LAKELAND	Beaver Dam WI	560670	Y
CAPITAL METRO	ATLANTA	Blairsville GA	120814	Y
EASTERN	CENTRAL PENNSYLVANIA	Bloomsburg PA	410732	Y
SOUTHWEST	ALABAMA	Boaz AL	010900	Y
GREAT LAKES	LAKELAND	Burlington WI	561240	Y
CAPITAL METRO	MID-CAROLINAS	Burnsville NC	361096	Y
EASTERN	CINCINNATI	Cambridge OH	381253	Y
CAPITAL METRO	ATLANTA	Canton GA	121386	Y
CAPITAL METRO	MID-CAROLINAS	Carrier Annex, Hendersonville NC	363513	Y
CAPITAL METRO	ATLANTA	Carrollton GA	121441	Y
GREAT LAKES	GATEWAY	Casey IL	161350	Y
CAPITAL METRO	RICHMOND	Churchland Sta, Portsmouth VA	517231	Y
CAPITAL METRO	ATLANTA	Cleveland GA	121793	Y
CAPITAL METRO	MID-CAROLINAS	Clinton NC	361568	Y
CAPITAL METRO	MID-CAROLINAS	Clover SC	451780	Y
CAPITAL METRO	MID-CAROLINAS	Concord Annex NC	361697	Y
CAPITAL METRO	MID-CAROLINAS	Concord NC	361696	Y
EASTERN	NORTHERN OHIO	Conneaut OH	381834	Y
CAPITAL METRO	ATLANTA	Cornelia GA	122101	Y

EASTERN	CINCINNATI	Coshocton OH	381918	Y
CAPITAL METRO	ATLANTA	Dahlonega GA	122288	Y
EASTERN	NORTHERN OHIO	Dover OH	382261	Y
CAPITAL METRO	MID-CAROLINAS	Ebenezer Sta, Rock Hill SC	457521	Y
GREAT LAKES	GATEWAY	Edwardsville IL	162382	Y
CAPITAL METRO	MID-CAROLINAS	Elizabethtown NC	362360	Y
SOUTHWEST	ALABAMA	Enterprise AL	012760	Y
GREAT LAKES	GATEWAY	Fenton MO	282688	Y
CAPITAL METRO	ATLANTA	Flowery Branch GA	123311	Y
CAPITAL METRO	MID-CAROLINAS	Forest City NC	362768	Y
CAPITAL METRO	ATLANTA	Forest Park GA	123333	Y
CAPITAL METRO	MID-CAROLINAS	Franklin NC	362816	Y
GREAT LAKES	LAKELAND	Franklin WI	563521	Y
CAPITAL METRO	ATLANTA	Gainesville GA	123498	Y
EASTERN	NORTHERN OHIO	Geneva OH	382982	Y
NORTHEAST	ALBANY	Gloversville Albany CT	353270	Y
GREAT LAKES	LAKELAND	Grafton WI	563320	Y
GREAT LAKES	LAKELAND	Greendale WI	563420	Y
CAPITAL METRO	ATLANTA	Griffin GA	123850	Y
SOUTHWEST	FT WORTH	Guymon OK	393663	Y
SOUTHWEST	ALABAMA	Hamilton AL	013860	Y
CAPITAL METRO	MID-CAROLINAS	Hampstead NC	363352	Y
SOUTHWEST	RIO GRANDE	Harlingen TX	483890	Y
CAPITAL METRO	MID-CAROLINAS	Havelock NC	363446	Y
PACIFIC	HONOLULU	Hilo HI	141900	Y
CAPITAL METRO	MID-CAROLINAS	Hope Mills NC	363736	Y
CAPITAL METRO	MID-CAROLINAS	Independence Sta, Charlotte NC	361392	Y
WESTERN	HAWKEYE	Iowa City IA	184392	Y
EASTERN	CINCINNATI	Ironton OH	383815	Y
PACIFIC	HONOLULU	Kahului HI	142900	Y
CAPITAL METRO	MID-CAROLINAS	Lancaster SC	454740	Y
GREAT LAKES	GATEWAY	Lawrenceville IL	164374	Y
PACIFIC	HONOLULU	Lihue HI	146200	Y
CAPITAL METRO	MID-CAROLINAS	Lincolnton NC	364472	Y
CAPITAL METRO	ATLANTA	Mableton GA	125467	Y
EASTERN	NORTHERN OHIO	Madison OH	384795	Y
CAPITAL METRO	MID-CAROLINAS	Marion NC	364864	Y
WESTERN	HAWKEYE	Mason City IA	185760	Y
EASTERN	NORTHERN OHIO	Massillon OH	384991	Y

CAPITAL METRO	MID-CAROLINAS	Matthews NC	364920	Y
EASTERN	CENTRAL PENNSYLVANIA	Milton PA	415460	Y
SOUTHWEST	RIO GRANDE	Mission TX	485995	Y
CAPITAL METRO	MID-CAROLINAS	Monroe NC Annex	365176	Y
CAPITAL METRO	MID-CAROLINAS	Mooresville NC	365208	Y
CAPITAL METRO	MID-CAROLINAS	Morehead City NC	365224	Y
CAPITAL METRO	MID-CAROLINAS	Murphy NC	365384	Y
CAPITAL METRO	MID-CAROLINAS	Myrtle Grove Station-Wilmington	368642	Y
CAPITAL METRO	MID-CAROLINAS	New Hope Sta, Gastonia NC	362914	Y
GREAT LAKES	LAKELAND	Oak Creek WI	566070	Y
GREAT LAKES	GATEWAY	Ofallon IL	165826	Y
GREAT LAKES	GATEWAY	Olney IL	165886	Y
SOUTHWEST	ALABAMA	Opelika AL	016160	Y
EASTERN	CINCINNATI	Portsmouth OH	386804	Y
CAPITAL METRO	RICHMOND	Portsmouth VA	517230	Y
CAPITAL METRO	ATLANTA	Powder Springs GA	127040	Y
GREAT LAKES	GATEWAY	Robinson IL	166732	Y
CAPITAL METRO	MID-CAROLINAS	Rock Hill SC	457520	Y
CAPITAL METRO	MID-CAROLINAS	Rockingham NC	366592	Y
CAPITAL METRO	MID-CAROLINAS	Rutherfordton NC	366776	Y
CAPITAL METRO	MID-CAROLINAS	Salisbury NC	366808	Y
GREAT LAKES	GATEWAY	Sedalia MO	287254	Y
SOUTHWEST	ALABAMA	Selma AL	017380	Y
EASTERN	CENTRAL PENNSYLVANIA	Shamokin PA	417608	Y
CAPITAL METRO	ATLANTA	Sharpsburg GA	127942	Y
CAPITAL METRO	MID-CAROLINAS	Shelby NC	367024	Y
SOUTHWEST	NORTH FLORIDA	Statesboro GA	128151	Y
EASTERN	CENTRAL PENNSYLVANIA	Sunbury PA	418256	Y
GREAT LAKES	LAKELAND	Sussex WI	568100	Y
SOUTHWEST	RIO GRANDE	Temple TX	488885	Y
WESTERN	NORTHLAND	Tomah WI	568230	Y
EASTERN	NORTHERN OHIO	Vermilion OH	388505	Y
GREAT LAKES	GATEWAY	Washington MO	288280	Y
CAPITAL METRO	MID-CAROLINAS	Waynesville NC	368384	Y
CAPITAL METRO	MID-CAROLINAS	Weaverville NC	368392	Y
GREAT LAKES	LAKELAND	West Bend WI	568770	Y

CAPITAL METRO	MID-CAROLINAS	Whiteville NC	368544	Y
EASTERN	NORTHERN OHIO	Wooster OH	389170	Y
CAPITAL METRO	MID-CAROLINAS	York SC	459880	Y
SOUTHWEST	RIO GRANDE	Austin TX Annex	480420	Y
NORTHEAST	CARIBBEAN	Catano DMDU Annex	428459	Y
GREAT LAKES	CHICAGO	JT Weeker IL ISC	160049	Y
PACIFIC	LOS ANGELES	Los Angeles CA ISC	054521	Y
SOUTHWEST	SOUTH FLORIDA	Miami FL ISC	115855	Y
NORTHEAST	TRIBORO	NY ISC - JFK	354170	Y
PACIFIC	SAN FRANCISCO	San Francisco CA ISC	056793	Y
GREAT LAKES	GREATER MICHIGAN	WHEELER STREET ANNEX MAIL PROCESSING ANNEX	258270	Y
WESTERN	ARIZONA	ALBUQUERQUE NM ASF ANNEX	340147	Y
CAPITAL METRO	RICHMOND	NORFOLK MAIL PROCESSING ANNEX	516523	Y
SOUTHWEST	RIO GRANDE	WACO ANNEX P&DF ANNEX	489397	Y
SOUTHWEST	ALABAMA	Mobile, AL Annex	015602	Y
SOUTHWEST	ALABAMA	Birmingham Annex	010781	Y
WESTERN	CENTRAL PLAINS	Omaha Mail Consolidation Center	306666	Y
SOUTHWEST	NORTH FLORIDA	BEAUFORT SC	450520	
NORTHEAST	ALBANY	BINGHAMTON STC*	0	Y
NORTHEAST	NEW YORK CITY	BRONX DETACHED MAIL UNIT DETACHED MAIL UNIT	350984	Y
GREAT LAKES	CENTRAL ILLINOIS	CHICAGO 2CMETRO A.K.A. CENTRAL ILLINOIS PSA	161541	Y
GREAT LAKES	CHICAGO	CHICAGO ISC ANNEX CHICAGO ISC ANNEX	160049	Y
EASTERN	TENNESSEE	CLINTON SE AREA OPS HASP	471760	Y
NORTHEAST	NEW YORK CITY	EASTSIDE PARCEL POST EASTSIDE PARCEL POST ANNEX	359667	Y
GREAT LAKES	GREATER INDIANA	INDIANAPOLIS SURFC TRANS CTR	172428	Y
NORTHEAST	TRIBORO	JFK ISC ANNEX JFK BUILDING 197	354170	Y
CAPITAL METRO	MID-CAROLINAS	KINSTON MAIL PROCESSING ANNEX	364120	Y
SOUTHWEST	ARKANSAS	LITTLE ROCK P&DC ANNEX LINDSEY ROAD ANNEX	045133	Y
EASTERN	KENTUCKIANA	LOUISVILLE AIRPORT ANNEX MAIL PROCESSING ANNEX	204788	Y
EASTERN	TENNESSEE	MEMPHIS STC	475669	Y
NORTHEAST	CONNECTICUT VALLEY	NEW ENGLAND STC	247820	Y
CAPITAL METRO	MID-CAROLINAS	FAYETTEVILLE P&DC ANNEX MAIL PROCESSING ANNEX	362681	Y
SOUTHWEST	SUNCOAST	ORLANDO STC	116920	Y
EASTERN	WESTERN PENNSYLVANIA	PITTSBURGH DIST ANNEX BUILDING II	416609	Y
PACIFIC	HONOLULU	SAIPAN PO	584000	Y
WESTERN	SALT LAKE CITY	SALT LAKE CITY REC	497786	Y
NORTHEAST	CARIBBEAN	SAN JUAN AMF	428465	Y
SOUTHWEST	NORTH FLORIDA	SAVANNAH PO	127815	Y
PACIFIC	SIERRA COASTAL	SOUTHERN CA STC MAIL PROCESSING ANNEX	058105	
SOUTHWEST	DALLAS	SOUTHWEST AREA STC*	0	Y
WESTERN	SALT LAKE CITY	STC - NEW BREED*	0	Y
CAPITAL METRO	CAPITAL	SUBURBAN MARYLAND ANNEX MAIL PROCESSING ANNEX	238750	Y

WESTERN	NORTHLAND	TWIN CITIES METRO HUB	266298	Y
WESTERN	CENTRAL PLAINS	WICHITA REMOTE ENCODING CNTR	194656	Y